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973-325-1500
Attorneys for Defendant Advanced
Environmental Technology Corp.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT GROUP,

Plaintiff,

v.

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION, et al.,

Defendants.

Civil Action No. 02-3830 (LDD)

**DECLARATION OF LAURIE J. SANDS,
ESQ., IN SUPPORT OF DEFENDANT
AETC'S MOTIONS IN LIMINE**

LAURIE J. SANDS, pursuant to 28 U.S.C. 1746 hereby declares as follows:

1. I am an attorney-at-law admitted to practice law before this Court Pro Hac Vice in connection with the above captioned matter and Counsel with the firm of Wolff & Samson PC attorneys for defendant Advanced Environmental Technology Corp. ("AETC") in the within matter. I submit this declaration in support of AETC's motions in limine.

2. Attached hereto as Exhibit A is a true and accurate copy of the Fifth Amended Complaint in this action.

3. Attached hereto as Exhibit B is a true and accurate copy of a letter dated September 9, 1976.

4. Attached hereto as Exhibit C is a true and accurate copy of relevant excerpts from the deposition of Manfred DeRewal, Sr.

5. Attached hereto as Exhibit D is a true and accurate copy of relevant excerpts from the testimony of Manfred DeRewal, Sr. in connection with an EPA civil investigation.

6. Attached hereto as Exhibit E is a true and accurate copy of the initial expert report submitted by Jay Vandeven.

7. Attached hereto as Exhibit F is a true and accurate copy of the reply expert report submitted by Jay Vandeven.

8. Attached hereto as Exhibit G is a true and accurate copy of the expert report submitted by W. Leigh Short Ph.D., PE, James Roetzer, Ph.D., and Gordon R. Jamieson, PG.

9. Attached hereto as Exhibit H is a true and accurate copy of relevant excerpts from the deposition of Jay Vandeven.

10. Attached hereto as Exhibit I is a true and accurate copy of relevant excerpts from Plaintiffs responses to Defendants Combined Contention Interrogatories.

11. Attached hereto as Exhibit J is a true and accurate copy of the expert report submitted by Jurgen Exner.

12. Attached hereto as Exhibit K is a true and accurate copy of Consent Decree OU-1.

13. Attached hereto as Exhibit L is a true and accurate copy of Consent Decree OU-2.

14. Attached hereto as Exhibit M is a true and accurate copy of the May 7, 2008 Vandeven Report.

15. Attached hereto as Exhibit N is a true and accurate copy of the Court's May 16, 2006 Eighth Case Management Order.

16. Attached hereto as Exhibit O is a true and accurate copy of Chitayat v. Vanderbilt Associates, 2007 WL 2890248 (E.D.N.Y. Sept. 27, 2007).

17. Attached hereto as Exhibit P is a true and accurate copy of Tobias v. Pennsylvania Board of Probation and Parole, 2005 WL 6042718 (E.D. Pa. April 26, 2005).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 23, 2008



LAURIE J. SANDS, ESQ.
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